



Miedel & Mysliwiec LLP

Application GRANTED. Sentencing is hereby
ADJOURNED to December 7, 2021, at 11:00 a.m. The Clerk
of Court is directed to terminate Doc. #132. SO ORDERED.

September 8, 2021

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', is written over the date 'September 9, 2021'.

September 9, 2021

Hon. Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Marquis Yohanis (19-CR-625 (JMF))

Dear Judge Furman,

Mr. Yohanis is currently scheduled to be sentenced by Your Honor on September 30, 2021, following his guilty plea to murder conspiracy and assault in aid of racketeering. I write to respectfully request an adjournment of sentencing. The government consents to the request.

As the Court knows, Mr. Yohanis's team includes a mitigation specialist, who has been busy gathering records and interviewing Mr. Yohanis and his family members in preparation for sentencing. Unfortunately, obtaining the relevant materials and conducting interviews has not been an entirely smooth process, given the current Covid pandemic. Access to Mr. Yohanis has also not always been easy. Accordingly, additional time is needed to complete our sentencing memorandum on behalf of Mr. Yohanis in this very serious case.

Accordingly, I respectfully request an adjournment of sentencing, which is the first such request. Complicating matters is that I am starting a 4 week-long trial on October 18 in the Southern District of Ohio, and will therefore be unable to appear for sentencing until after Thanksgiving. I consequently ask the Court's indulgence to schedule Mr. Yohanis's sentencing for the first week of December, or whenever is convenient for the Court thereafter. As noted, the government consents to this request.

Respectfully,

/s/

Florian Miedel
Attorney for Marquis Yohanis

cc: All Counsel